

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

RALEIGH WAKE CITIZENS ASSOCIATION,)	
et al.)	
)	
<i>Plaintiffs,</i>)	
)	No. 5:15-cv-156
v.)	
)	
WAKE COUNTY BOARD OF ELECTIONS,)	
)	
<i>Defendant.</i>)	
CALLA WRIGHT, et al.)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	No. 5:13-cv-607
)	
STATE OF NORTH CAROLINA, et al.)	
)	
<i>Defendant.</i>)	
_____)	

RESPONSE TO MOTION TO INTERVENE

Defendant Wake County Board of Elections respectfully submits this response to the Expedited Motion to Intervene by Caroline Sullivan (“Proposed Intervenor”).

Defendant takes no position on the propriety of the Expedited Motion to Intervene as a procedural matter, but Defendant opposes Proposed Intervenor’s underlying Motion for Expedited Relief Under the Court’s 9 August 2016 Order and requests that such underlying motion be denied.

Given the Court’s retention of jurisdiction regarding its August 9, 2016 Order, and in the interest of judicial economy, Defendant plans to submit to the Court an opposition to the Proposed Intervenor’s Motion for Expedited Relief by 5:00 p.m. tomorrow, August 24, 2016, for the Court’s consideration in the event the Court allows the Motion to Intervene.

In view of the pressing election-related deadlines and ongoing work of Defendant with respect to the preparation and mailing of ballots, Defendant also requests an expedited proceeding and disposition of this matter.

Respectfully submitted the 23rd day of August, 2016.

/s/ Charles F. Marshall

Charles F. Marshall

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Jessica Thaller-Moran

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CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and have verified that such filing was sent electronically using the CM/ECF system to the following:

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Respectfully Submitted,

/s/ Charles F. Marshall
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